

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CARLOS MUNOZ, et al.,

Plaintiffs,

vs.

CHINA EXPERT TECHNOLOGY, INC.; PKF
NEW YORK, CERTIFIED PUBLIC
ACCOUNTANTS, A PROFESSIONAL CORP.;
PKF HONG KONG, CERTIFIED PUBLIC
ACCOUNTANTS; AND BDO MCCABE LO
LTD., CERTIFIED PUBLIC ACCOUNTANTS,

Defendants.

07-CV-10531 (AKH)

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the annexed Declaration of Cameron Smith, dated December 14, 2009, the Declaration of Joseph Fok, S.C., J.P., dated December 11, 2009, the Declaration of Dr. Xixin Wang, dated December 12, 2009, the Declaration of Johnson Kong, dated December 10, 2009, the Declaration of Derek Wan, dated December 11, 2009, and the accompanying Memorandum of Law, dated December 14, 2009, the undersigned, on behalf of Defendants BDO Limited (f/k/a BDO McCabe Lo Ltd.) ("BDO Ltd.") and PKF Hong Kong, hereby move this Court, before the Honorable Alvin K. Hellerstein, United States District Judge, at the United States Courthouse, 500 Pearl Street, Courtroom 14D, New York, New York 10007, for an Order dismissing the Second Amended Complaint on the ground of *forum non conveniens*.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Stipulation and Order entered in this action on October 19, 2009, Plaintiffs' opposition papers shall be submitted on or before January 28, 2010, and Defendants' reply papers shall be submitted on or before February 26, 2010.

Dated: December 14, 2009

Respectfully Submitted,


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